

# Exhibit

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**Joel B. Rothman**  
*Board Certified in Intellectual Property Law*  
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 joel.rothman@sriplaw.com

July 22, 2021

**VIA EMAIL: jordanhorowitz@cooper-horowitz.com**

Mr. Justin Horowitz  
 Traded Media, LLC.  
 250 E 53rd Street  
 New York, NY 10022

**Re: Ajay Suresh v. Traded Media, LLC.**  
**Our File: 00740-0002**

Dear Mr. Horowitz,

**We are a law firm making a claim on behalf of our client. We know that this is reaching you during a difficult and trying time and that you may have more pressing concerns. We appreciate that responding to this letter may not be your first priority. However, we must receive a response from you so that we know that you are taking this matter seriously, even if you need more time to hire a lawyer or report this claim to your insurance carrier. If we hear from you then we can work with you to understand your position and resolve our client's claim. Please respond to us.**

We write on behalf of our client Ajay Suresh, a photographer, for purposes of resolving a case of copyright infringement against you by our client. This demand is privileged from disclosure pursuant to FRE Rule 408.

Please provide this letter to your general liability insurance carriers or other providers of insurance that may cover this claim.

*Ajay Suresh ("Suresh")*

Our client is an experienced professional photographer who makes a living from photography. Our client is an experienced, self-taught photographer, who has been capturing street and travel photographs for more than five years. He uses Olympus lenses and cameras for his work.

Suresh retains all copyrights to his photographs. Suresh licenses his copyrighted Works, such as the one in this case, for commercial use.

Suresh created the image, hereinafter referred to as the "Work."

CALIFORNIA	GEORGIA	FLORIDA	TENNESSEE	NEW YORK
8730 Wilshire Boulevard Suite 350 Beverly Hills, CA 90211	12 Powder Springs St. Suite 200 Marietta, GA 30064	21301 Powerline Rd Suite 100 Boca Raton, FL 33433	818 18th Ave S. 10th Floor Nashville, TN 37203	125 Maiden Lane Suite 5C New York, NY 10038

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The Work at issue is shown below.



Suresh registered the Work with the Register of Copyrights on July 29, 2019 and was assigned the registration number VA 216-4-937, a copy of which is enclosed.

*The Work was Creative Commons Licensed*

Our client shares his Works online for reuse pursuant to a Creative Commons License. The Creative Commons License applied to the Work online by our client was CC BY 2.0.

The CC BY 2.0 License allows you to share our client's Work with **attribution**. As long as you give appropriate credit to our client as the creator of the Work, provide a link to the Creative Commons license, and indicate if any changes were made to our client's Work, you have complied with the license terms.

Creative Commons Licenses are non-exclusive licenses. A user's failure to comply with a Creative Commons License terms takes the use beyond the scope of the license. *Atkins v. Fischer*, 331 F.3d 988, 991 (D.C. Cir. 2003). A licensee who acts outside the scope of a

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nonexclusive license is liable for copyright infringement to the licensor. *S.O.S., Inc. v. Payday, Inc.*, 886 F.2d 1081, 1087 (9th Cir. 1989). Violation of the conditions of public licenses, such as the Creative Commons License at issue here, gives rise to a claim for copyright infringement just like it would in the case of any other limited, nonexclusive license. *Jacobsen v. Katzer*, 353 F.3d 1373, 1380 (Fed. Cir. 2008)(finding infringement when the defendant exceeded the scope of the Artistic License, another type of public license similar to Creative Commons).

The contemporaneous evidence of infringement enclosed indicates that the applicable Creative Commons License was not complied with.

*Infringement by Traded Media, LLC. ("TM LLC")*

We have enclosed contemporaneous evidence of the infringement by TM LLC. In addition to the infringement, Suresh's photograph was very obviously cropped as shown on the attached. You have employed our client's Work in at least the manner indicated in the evidence attached. You are fully aware that the Work you used is our client's Work. No one from your company ever sought a license from our client to use the Work for any purpose.

You have copied, displayed and distributed our client's Work without permission, license or consent. The use of a creator's photographic image without written consent or license violates the United States Code, Title 17, and The Copyright Act. The Copyright Act provides for entry of an injunction directing removal of the offending materials pending litigation. This letter shall serve as formal notice that you immediately cease and desist all unauthorized uses of our client's Work. Any such further uses shall be at your peril.

If you possess a contract, license, agreement or writing on which you will rely for authorization of your use of our client's Work, please provide us with this evidence so we may avoid further controversy or litigation. Otherwise, we will be forced to assume that your use violated the law.

*Damages*

Copyright law provides several different elements of compensation to Suresh when a work is infringed or altered. Section 504 permits Suresh to recover actual damages plus "any additional profits of the infringer that are attributable to the infringement and are not taken into account in computing the actual damages," or statutory damages of up to \$150,000 per work infringed if the registration predated the infringement. Suresh can present both damages theories to the jury and select the higher award any time prior to entry of judgment.

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Academic studies have demonstrated that the use of good quality photographs more effectively market and advertise products and drive sales. Suresh's photographs are of the highest quality. Suresh's photographs are also scarce since he is one of the only sources of such quality photographs.

Suresh's damages are not limited to what he would have agreed to license the Work for prior to the infringement. Rather, Suresh's actual damages will be measured by the fair market value of the photograph considering TM LLC's use to sell and promote its business. Suresh's actual damages must be measured in light of TM LLC's use of Suresh's high quality and unique Work.

This is consistent with federal courts' approach to broadly construing the term "actual damages" to favor victims of infringement. See, e.g., *Davis v. Gap, Inc.*, 246 F.3d 152, 164 (2d Cir. 2001). The fair market value approach for calculating damages is an accepted approach to valuing the defendants' uses of photographs. See *Leonard v. Stemtech Int'l, Inc.*, Nos. 15-3198, 15-3247, 2016 U.S. App. LEXIS 15565 (3d Cir. Aug. 24, 2016). In addition, Suresh can offer evidence of the actual cost to take the photograph infringed on a time and materials basis.

Section 504 of the Copyright Act permits Suresh to recover actual damages plus "any additional profits of the infringer that are attributable to the infringement and are not taken into account in computing the actual damages." Therefore, Suresh will also be entitled to TM LLC's profits from the infringement, based upon the revenue TM LLC earned in connection with the use of Suresh's Work.

Alternatively, Suresh could seek statutory damages for infringement in an amount of up to \$30,000 per work infringed if the registration predated the infringement. There is also the possibility that a judge or jury could determine that TM LLC's infringement was willful. If TM LLC's infringement was shown to be willful, the statutory damage award would increase to an amount up to \$150,000 per work infringed.

#### *Demand*

In order to determine how to proceed, please provide us with information and documents showing:

1. the full nature and extent of the use of our client's Work, in any and all formats;
2. representative copies in any and all tangible form and media in which our client's Work was incorporated or employed; and

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3. the source of the Work.

Upon receipt of this information we will consider and determine an appropriate amount required to be paid to our client in compensation.

Please carefully consider this letter and the associated exhibits and provide them to your attorneys and insurance carriers. If we do not receive a response from you or a representative by August 5, 2021, we will take further steps to protect our client's rights.

We look forward to your prompt response.

Sincerely,

**SRIPLAW**



Joel B. Rothman

JBR/lmd  
Enclosures

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Copyright Catalog (1978 to present)

Search Request: Left Anchored Copyright Number = VA0002164937

Search Results: Displaying 1 of 1 entries

[previous](#) [next](#)

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2019 Photos by Ajay Suresh.

**Type of Work:** Visual Material

**Registration Number / Date:** VA0002164937 / 2019-07-29

**Application Title:** 2019 Photos by Ajay Suresh

**Title:** 2019 Photos by Ajay Suresh. [Group registration of published photographs. 595 photographs. 2019-01-06 to 2019-07-25]

**Description:** 595 photographs : Electronic file (eService)

**Copyright Claimant:** Ajay Suresh, 1991-. Address: 225 E 95th St, Apt 25B, New York, NY, 10128, United States.

**Date of Creation:** 2019

**Publication Date Range:** 2019-01-06 to 2019-07-25

**Nation of First Publication:** United States

**Authorship on Application:** Ajay Suresh, 1991- ; Citizenship: United States. Authorship: photographs.

**Rights and Permissions:** Ajay Suresh, 225 E 95th St, Apt 25B, New York, NY, 10128, United States, (734) 239-5669, ajaysuresh@outlook.com

**Copyright Note:** Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

**Photographs:** Published in January 2019 (24 photographs): Coronado-3, Coronado-6, LaJolla-1, LaJolla-2, LaJolla-6, Levis, SanDiego-2, SanDiegoZoo-1, SanDiegoZoo-10, SanDiegoZoo-11, SanDiegoZoo-12, SanDiegoZoo-13, SanDiegoZoo-14, SanDiegoZoo-15, SanDiegoZoo-16, SanDiegoZoo-17, SanDiegoZoo-18, SanDiegoZoo-3, SanDiegoZoo-4, SanDiegoZoo-6, SanDiegoZoo-7, SanDiegoZoo-8, SanDiegoZoo-9, Warby Parker

Published in February 2019 (17 photographs): Apartment-UES-1, CastlewoodPark-STL-2, CastlewoodPark-STL-3, CastlewoodPark-STL-4, CastlewoodPark-STL-5, CastlewoodPark-STL-6, CastlewoodPark-STL-9, Downtown Brooklyn from Gowanus, Downtown-STL-1, Downtown-STL-10, Downtown-STL-2, Downtown-STL-3, Downtown-STL-4, Downtown-STL-7, Downtown-STL-8, Downtown-STL-9, F-Train in Gowanus,

Published in March 2019 (2 photographs): PatagoniaLabel-1, PatagoniaLabel-2,

Published in April 2019 (5 photographs): ConeyIsland2019-1, ConeyIsland2019-2, ConeyIsland2019-3, ConeyIsland2019-4, ConeyIsland2019-5,

Published in May 2019 (27 photographs): 901Broadway-1, 901Broadway-2, A Latte in NYC, Amazon Go, Amazon Go Banner, Amazon Originals, Amazon Prime Now Logo, Amazon Prime Rewards Card, Amazon Prime Video Streaming, BeatsHeadphones-1, BeatsHeadphones-2, ChaseSapphire, Coach Logo, HudsonYards\_05-06-19-1, HudsonYards\_05-06-19-2, HudsonYards\_05-06-19-3, Netflix Streaming, RawDenim-1, RawDenim-2, RawDenim-3, RawDenim-6, RawDenim-7, StIves-1, Whole Foods Market Logo, Workspace-1, Workspace-2, YouTube Streaming,

Published in June 2019 (87 photographs): Fox News Wall, Fox News Wall - Carlson Baier Ingraham, Fred F French Building, Frederick Loewe Theatre, Fulton Center - Entrance, Fulton Center - Full, Fulton Center - Side Profile, G-Star Raw Storefront, Granada-Day1-10, Granada-Day1-11, Granada-Day1-12, Granada-Day1-13, Granada-Day1-14, Granada-Day1-15, Granada-Day1-16, Granada-Day1-17, Granada-Day1-8, Granada-Day1-9, Granada-Day2-1, Granada-Day2-10, Granada-Day2-15, Granada-Day2-17, Granada-Day2-18, Granada-Day2-19, Granada-Day2-22, Granada-Day2-20, Granada-Day2-21, Granada-Day2-22, Granada-Day2-23, Granada-Day2-24, Granada-Day2-26, Granada-Day2-27, Granada-Day2-28, Granada-Day2-29, Granada-Day2-3, Granada-Day2-30, Granada-Day2-31, Granada-Day2-33, Granada-Day2-34, Granada-Day2-35, Granada-Day2-36, Granada-Day2-38, Granada-Day2-4, Granada-Day2-7, Granada-Day2-8, Granada-Day2-9, Granada-Day3-1, Granada-Day3-2, Granada-Day3-3, Granada-Day3-4, Granada-Day3-5, Granada-Day3-6, Granada-Day3-7, Gristedes Storefront, Gucci NYC Flagship, HBO Headquarters, Home Depot Storefront, Hospital for Special Surgery, House used for the Cosby Show, Hunter College High School, Icahn School of Medicine, Ikea Planning Studio, Jacob K. Javits Federal Building, Jewish Museum, King Kong at the Broadway Theater, Late Show with Stephen Colbert Signage, Leslie-Lohman Museum of Gay and Lesbian Art - NYC, Levi's Storefront, Lincoln Center Angle, Lincoln Center Overview, Long Island Rail Road (LIRR) Entrance, Longchamp Flagship, Looking on a Mini, Louis Vuitton NYC Flagship, Lululemon Storefront, Madison Square Garden (MSG) - Closeup with Empire State Building, Madison Square Garden (MSG) - Empire State Building, Madison Square Garden (MSG) - Full, Madison Square Garden (MSG) - Hulu Theater, Maison Kayser Storefront, Manhattan Mall, Manhattan Municipal Building, Manhattan Sunset - Manhattan Municipal Building, Mark Twain House (Aka House of Death), Mattress Firm Storefront, Merchant's House Museum, MET Opera,

Published in June 2019 (42 photographs): The Africa Center, The Astor Place Cube, The Children's Place Storefront, The Comedy Cellar, The Cooper Union - Cooper Union Academic Building Entrance, The Cooper Union's Foundation Building - North Side, The Cooper Union's Foundation Building - South Side, The Drawing Center - NYC, The House used in Friends, The IFC Center, The Lion King at the Minskoff Theatre, The MET, The Paley Center for Media, The Public Theater, The SoHo Playhouse, The University Center for the New School, Thurgood Marshall United States Courthouse, Tibet House US, Tide Detergent, Tide Detergent - Tight, Tiffany and Co Flagship, Times Square Studios - GMA, Tournear Watches, Touro College, Triumph of the Human Spirit - Foley Square, Trump Palace, Trump Tower Entrance, Trump Tower in the Clouds, Twin Peaks, U.S. District Court - Southern District of New York, Uniqlo Logo, United States Attorney for the Southern District of New York, United States Court of International Trade, Urban Outfitters Storefront, Viacom Headquarters, Village Voice, Vineyard Vines Storefront, Warby Parker, Weill Cornell Medicine, WeWork, Windex, Zara Storefront,

Published in June 2019 (55 photographs): Metropolitan Correctional Center New York, Microsoft Logo, Milano School of Policy Management and Environment, Morgan Stanley Headquarters, Museum of Chinese in America (MOCA) - NYC, My Fair Lady at the Lincoln Center Theatre, NASDAQ MarketWatch, NathansHotDog-1, NathansHotDog-2, NathansHotDog-3, NathansHotDog-4, NathansHotDog-5, National Academy of Design, NBA Store - NYC, NBA Store - Full, NBC News - NBC Studio 1A - The Today Show, Neue Gallery, New York Academy of Medicine, New York City Criminal Court, New York City Marriage Bureau at the Louis J. Lefkowitz State Office Building, New York Correction Department, New York Correction Department - Bus, New York Correction Department - Truck Front, New York County Courthouse, New York County Courthouse - Angle Shot, New York County Criminal Court, New York County Family Court, New York County Family Court - Entrance, New York Film Academy, New York Society Library, New York Stock Exchange (NYSE) - Slack Direct Offering, News Corporation Headquarters, Nike Flagship - NYC, Nike House of Innovation, Nordstrom Rack Storefront, NYPD Headquarters - One Police Plaza, NYPL for the Performing Arts, NYU Stern School of Business - Full Building, NYU Stern School of Business - Henry Kaufman Management Center, NYU Stern School of Business - Paulson Auditorium, NYU Stern School of Business - Plaza Level, Original Store - Bergdorf Goodman, Pace University - Building, Pace University - Logo, Panda Express Storefront, PapayaKing-1, Paris Theater, Park Lane Hotel, Pier 1 Imports Storefront, Rent the Runway Flagship, Rockefeller University, Rumble Storefront, Saks Fifth Avenue, School of the International Center of Photography, Seal of the United States Supreme Court - SDNY,

Published in June 2019 (96 photographs): 1 Police Plaza, 100 Centre St - New York City, 5 in 1 Sculpture - One Police Plaza, 7 Eleven Storefront, 92Y, 92Y Profile, Adidas NYC Flagship, Alice Tully Hall, Amazon Web Services (AWS) Loft - NYC, Amazon Web Services (AWS) Loft - NYC - Banner, American Folk Art Museum, Atlantic Terminal, Bail Bonds - Manhattan, BarclayCenter-1, BarclayCenter-2, Barclays - NYC Headquarters, Barnes & Noble Storefront, Benjamin N. Cardozo School of Law, Benjamin N. Cardozo School of Law - Detail, Bergdorf Goodman Entrance, Best Buy Manhattan, Bloomingdale's, Blue mercury Storefront, Bobst Library, Brown Brothers Harriman, Bulgari NYC Flagship, Cafe Wha?, Carnegie Hall - Entrance, Carnegie Hall - Full, Center for Jewish History, Center for Jewish History - Side View, Cherry Lane Theatre, Chinatown Starbucks, Citi Bike Rebalancing, Coach House - NYC, Confucius Plaza from Chinatown, Confucius Plaza from Chinatown - Landscape, Cooper Hewitt, Cooper Hewitt Logo, Cooper Union - Cooper Union Academic Building, Cordoba-1, Cordoba-10, Cordoba-11, Cordoba-12, Cordoba-13, Cordoba-14, Cordoba-15, Cordoba-16, Cordoba-17, Cordoba-18, Cordoba-2, Cordoba-22, Cordoba-23, Cordoba-24, Cordoba-25, Cordoba-26, Cordoba-27, Cordoba-28, Cordoba-29, Cordoba-3, Cordoba-30, Cordoba-31, Cordoba-32, Cordoba-33, Cordoba-34, Cordoba-35, Cordoba-36, Cordoba-37, Cordoba-38, Cordoba-39, Cordoba-4, Cordoba-5, Cordoba-6, Cordoba-7, Cordoba-8, Courant Institute of Mathematical Sciences, David Geffen Hall, Deutsche Bank Entrance, Dior NY Flagship, Ed Sullivan Theater, Entrance to the Icahn School of Medicine, Entrance to Tiffany and Co Flagship, Equinox Entrance, Equinox Lettering, Ethan Allen Storefront, Febreze - Tight Shot, Federal Hall, Federal Reserve Bank of New York Building - Entrance, Federal Reserve Bank of New York Building - Full, FedEx Office, Film Forum, Financial Industry Regulatory Authority (FINRA), Fordham University School of Law, Former Lord & Taylor Building,

Published in June 2019 (71 photographs): Sevilla-1, Sevilla-10, Sevilla-11, Sevilla-12, Sevilla-13, Sevilla-14, Sevilla-2, Sevilla-2-1, Sevilla-2-2, Sevilla-2-3, Sevilla-2-4, Sevilla-2-5, Sevilla-2-6, Sevilla-2-7, Sevilla-2-8, Sevilla-3, Sevilla-3-1, Sevilla-3-10, Sevilla-3-11, Sevilla-3-12, Sevilla-3-13, Sevilla-3-14, Sevilla-3-15, Sevilla-3-16, Sevilla-3-17, Sevilla-3-18, Sevilla-3-19, Sevilla-3-2, Sevilla-3-20, Sevilla-3-21, Sevilla-3-3, Sevilla-3-4, Sevilla-3-5, Sevilla-3-6, Sevilla-3-7, Sevilla-3-8, Sevilla-4, Sevilla-4-1, Sevilla-4-10, Sevilla-4-11, Sevilla-4-12, Sevilla-4-13, Sevilla-4-14, Sevilla-4-15, Sevilla-4-16, Sevilla-4-17, Sevilla-4-18, Sevilla-4-19, Sevilla-4-20, Sevilla-4-21, Sevilla-4-22, Sevilla-4-23, Sevilla-4-24, Sevilla-4-25, Sevilla-4-26, Sevilla-4-27, Sevilla-4-28, Sevilla-4-29, Sevilla-4-30, Sevilla-4-31, Sevilla-4-32, Sevilla-4-33, Sevilla-4-34, Sevilla-4-35, Sevilla-4-36, Sevilla-4-37, Sevilla-4-38, Sevilla-4-39, Sevilla-4-40, Sevilla-4-41, Sevilla-4-42, Sevilla-4-43, Sevilla-4-44, Sevilla-4-45, Sevilla-4-46, Sevilla-4-47, Sevilla-4-48, Sevilla-4-49, Sevilla-5, Sevilla-6, Sevilla-7, Sevilla-8, Sevilla-9, Skirball Center, Skirball Center Entrance, Smile Direct Club Storefront, Steinway & Sons Storefront, Strand Bookstore - Landscape, StubHub Storefront, SUNY Stat College of Optometry, Sur La Table Storefront, Sushi Ginza Onodera,

Published in July 2019 (44 photographs): 7th Avenue - Midtown, Al Hirschfeld Theatre - Moulin Rouge, Alvin Ailey American Dance Theater, Ambassador Theatre - Chicago, American Airlines Theatre, American Museum of Natural History - Entrance, ASA College, B & H Photo Storefront, Baked by Melissa, Bitcoin ATM Sign, Booth Theatre, Broadhurst Theater - Frankie and Johnny in the Clair de Lune, Brooklyn Academy of Music (BAM), Brooklyn Friends School - Entrance, Brooklyn Friends School - Flag, Brooklyn Friends School - Law School Entrance, Brooklyn Law School, Brooklyn Municipal Building, Brooklyn Public Library, Brooklyn Public Library - Central Library, Brooklyn Tech, Brooks Atkinson Theater - Waitress, Cadman Plaza - Brooklyn War

Memorial, Carolines on Broadway, Central Park - Kerbs Memorial Boathouse, Central Park - Loeb Boathouse, Central Park - Naumburg Bandshell, Central Park - The Pond, City College of New York - North Academic Building, City College of New York - Bernard and Anne Spitzer School of Architecture, City College of New York - Grove School of Engineering, City College of New York - High School for Math Science and Engineering at City College, City College of New York - Welcome, City Tech - Academic Building, City Tech - Building, City Tech - Logo, City Tech - The Atrium, City Tech - Wordmark, Collegiate School (New York City), Columbia Business School - Ursis Hall, Columbia Law School - Arthur W Diamond Library, Columbia Law School - Bellerophon Taming Pegasus, Columbia Law School - Jerome L Greene Hall, Columbia University - School of International and Public Affairs,

Published in July 2019 (35 photographs): Second Stage Theater - Tony Kiser Theater, Seventh Regiment Armory - Park Avenue Armory - Front, Shirley A Chisholm State Office Building, Shubert Theatre, Spence School, Spyscape, St Francis College - Administration Building, St Francis College - Name, St Francis College - Science and Technology Building, St James Theatre - Frozen, St. Bernard's School, Studio 54, Sweetgreen Storefront, Tapestry Inc - Headquarters, Tapestry Inc - The Shed & The Vessel Reflection, The Berkeley Carroll School - Entrance, The Dakota, The Kenilworth, The Longacres Theatre - The Prom, The Museum at FIT, The Shed - Complete, The Shed - Wheels, The Shops Hudson Yards, The Vessel from the Shops at Hudson Yard, Time Square - TKTS Stand, Trevor Day School, Trevor Day School - Entrance, United States Courthouse - Eastern District of New York, United States Courthouse - Eastern District of New York 2, Valley National Bank, Van Leeuwen Vegan Ice Cream, Walter Kerr Theatre - Hadestown, Wetherby-Pembroke School, Whole Foods - Upper East Side, Winter Garden - Beetlejuice the Musical, Published in July 2019 (45 photographs): Columbia University - Alma Mater, Columbia University - Butler Library, Columbia University - Department of Physics, Columbia University - Lion Sculpture, Columbia University - Low Memorial Library, Columbia University - St. Paul's Chapel, Columbia University - Teachers College, Columbia University - The Fu Foundation School of Engineering and Applied Science, Columbia University - The Northwest Corner Building, Convent of the Sacred Heart, CUNY School of Medicine - Townsend Harris Hall, David H Koch Theater, Duane Reade Pharmacy Storefront, East Harlem Skyline, Eugene O'Neill Theatre - Book of Mormon, Fashion Institute of Technology (FIT), Film at Lincoln Center - Elinor Bunin Munroe Film Center, Film Society of Lincoln Center, Fiorello H LaGuardia High School, Fiorello H LaGuardia High School - Entrance, Formula E - NYC ePrix 2019 - Allianz E-Village, Formula E - NYC ePrix 2019 - José María López Crash, Formula E - NYC ePrix 2019 - Mitch Evans, Formula E - NYC ePrix 2019 - Pascal Wehrlein, Formula E - NYC ePrix 2019 - Stoffel Vandoorne, Formula E - NYC ePrix 2019 - Straight Racer, Formula E - NYC ePrix 2019 - Straightway Blur, Formula E - NYC ePrix 2019 - Top-Line Speed, Frozen on Broadway, Future Chick-fil-A - Upper East Side, Golden Theater, Hamilton Grange National Memorial - Entrance, Hamilton Grange National Memorial - Patio, Harlem School of Arts, Hatzolah Ambulances, Hewitt School, Imperial Theater - ain't too proud, Jacobs Theater - The Ferryman, John Jay College of Criminal Justice - Entrance, John Jay College of Criminal Justice - New Building, Kings County Supreme & Family Court, LIU Brooklyn - Arnold and Marie Schwartz College of Pharmacy, LIU Brooklyn - Entrance, LIU Brooklyn - Flags, Loomis Armored Truck,

Published in July 2019 (45 photographs): Lunt-Fontanne Theatre - Dave Chappelle, Lyceum Theatre, Lyric Theatre - Harry Potter and the Cursed Child, Lyric Theatre - Harry Potter and the Cursed Child, Majestic Theater - The Phantom of the Opera, Mercedes-Benz EQ Silver Arrow, Mercedes-Benz EQ Silver Arrow - Front, Mercedes-Benz EQ Silver Arrow - Logo, MET Breuer, Metropolitan Hospital Center, MoCADA, MoCADA - 80 Hanson Place, Model's Sporting Goods, Music Box Theater - Dean Evan Hansen, Music Box Theater - Front, National Academy School of Fine Arts, Nederlander Theatre - Pretty Woman, Neil Simon Theatre, New Amsterdam Theater - Aladdin, New Victory Theater, New York Historical Society, New York Public Library - 96th Street Library, New York Sports Club - Upper East Side, New York Times Building - Bottom Portion, New York Times Building - New York Times Logo, Nightingale-Bamford School, NYC Emergency Management (NYCEM) - Name, NYC Emergency Management (NYCEM) - Profile, NYU Tandon - Bern Dibner Library of Science and Technology, NYU Tandon - Church, NYU Tandon - Wordmark, On Prospect Park, Otto H Kahn House, Packer Collegiate Institute, Park Slope Brownstone, PC Richard & Son, Playstasion Theater, Port Authority Bus Terminal, Pret A Manger Storefront, Ramakrishna Vivekananda Center of New York, Regis High School, Rodgers Theater - Hamilton, Rose Center for Earth and Space, Saint David's School, Schoenfeld Theater - Come From Away,

Names: [Suresh, Ajay, 1991-](#)

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Instagram

Rechercher

traded<sup>ny</sup>  
Touro College Graduate School of Education

traded<sup>ny</sup> LOAN  
IMAOF: Justin Horowitz  
DATE: 10/01/2020  
ADDRESS: 322 W. 51st ST.  
MARKET: NYX00-USA  
LOAN AMOUNT: \$15,500,000  
LOAN TYPE: Refinancing (Fee  
Mortgage)  
LENDER: Apple Bank for Savings  
LANDLORD: Overline Properties  
Andrew Edelman  
BROKER: Justin Horowitz - Coop-  
Horowitz, LLC  
LEINAN: Touro College  
LESSOR: Overline Properties  
LESSEE: Columbia Property Trust

\$15,500,000

225 Jaime  
3 NOVEMBRE 2020

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\$19,000,000

MÉRIDIAN RETAIL LEASING

\$192/ft.-1,100 sf.

\$19,750,000

\$2,338,000

\$31/ft.-9,000 sf.

\$5,496,341

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Instagram

Rechercher

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**tradedny LOAN**

IMAGE: Justin Horowitz

DATE: 10/30/2020

ADDRESS: 320 W. 31st St.

MARKET: Mixed-use

LOAN AMOUNT: \$15,500,000

LOAN TYPE: Refinancing (Fee Mortgage)

LENDER: Apple Bank for Savings

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225 J'aime

3 NOVEMBRE 2020

Ajouter un commentaire...

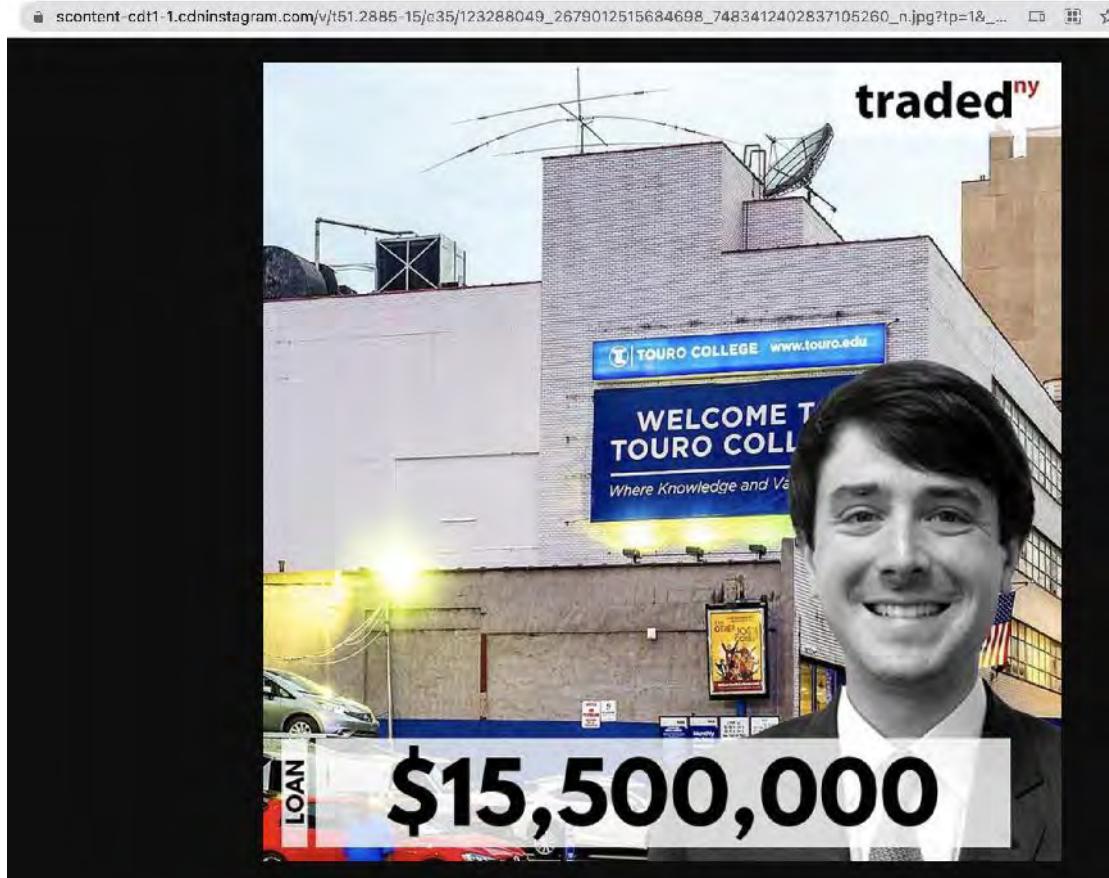
[Répondre](#)

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<https://www.instagram.com/p/CHIvIziL9BD/>

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The image is a screenshot of the Instagram homepage. At the top, there is a search bar with the placeholder text "Rechercher" and a magnifying glass icon. To the right of the search bar are several icons: a house (Home), a triangle (Search), a compass (Explore), a heart (Likes), and a profile picture (Profile). Below the search bar, there is a banner with three large numbers: \$2,338,000, \$31/ft.-\$9,000 sf., and \$5,490,341. The banner also features the Instagram logo and the text "LEADER". At the bottom of the page, there is a navigation bar with links: À propos, Blog, Emplois, Aide, API, Confidentialité, Conditions, Comptes principaux, Hashtags, and Lieux. There is also a language link "Français" with a dropdown arrow, and a copyright notice "© 2021 Instagram par Facebook".





**Joel B. Rothman**  
Board Certified in Intellectual Property Law  
Direct: 561.404.4335  
joel.rothman@sriplaw.com

September 8, 2021

**VIA EMAIL: jordanhorowitz@cooper-horowitz.com**

Mr. Justin Horowitz  
Traded Media, LLC.  
250 E 53rd Street  
New York, NY 10022

**Re: Ajay Suresh v. Traded Media, LLC.**  
**Our File: 00740-0002**

Dear Mr. Horowitz,

**We are a law firm making a claim on behalf of our client. We know that this is reaching you during a difficult and trying time and that you may have more pressing concerns. We appreciate that responding to this letter may not be your first priority. However, we must receive a response from you so that we know that you are taking this matter seriously, even if you need more time to hire a lawyer or report this claim to your insurance carrier. If we hear from you then we can work with you to understand your position and resolve our client's claim. Please respond to us.**

We write this follow up letter on behalf of our client Ajay Suresh, for the purposes of resolving a case of copyright infringement against you by our client. This demand is privileged from disclosure pursuant to FRE Rule 408.

Enclosed please find our prior letter dated July 22, 2021, wherein we detailed the basis of the copyright infringement claim against you, including the evidence of infringement.

We note that a review of the accused infringing webpage shows that the infringement has been removed. However, this does not dispose of our client's claim. It is imperative that you respond to us. If we do not hear back from you, we will be forced to take further steps to protect our client's rights including by filing a lawsuit against you. We

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8730 Wilshire Boulevard Suite 350 Beverly Hills, CA 90211	12 Powder Springs St. Suite 200 Marietta, GA 30064	21301 Powerline Rd. Suite 100 Boca Raton, FL 33433	818 18th Ave. S. 10th Floor Nashville, TN 37203	125 Maiden Lane Suite 5C New York, NY 10038

Mr. Justin Horowitz  
Traded Media, LLC.  
September 8, 2021  
Page 2

also repeat our demand that you tender this claim to your insurance carrier. We look forward to your prompt response.

Sincerely,

**SRIPLAW**



Joel B. Rothman

JBR/lmd

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